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Lea Márquez Peterson – Chairwoman
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JIM O'CONNOR
Commissioner

ARIZONA CORPORATION COMMISSION

May 17, 2021

Docket Control
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

**RE: In the matter of possible modifications to the Arizona Corporation
Commission's Energy Rules (Docket No. RU-00000A-18-0284)**

My Fellow Commissioners:

I am responding to the Chairwoman's May 12 letter asking to indicate – in the spirit of compromise – which amendments I can support.

I agree it is best we begin again with the original Recommended Opinion & Order.

I recommend passage again of O'Connor 2nd Revised Amendment #1 which addresses the concern for having cost comparisons to a scenario prepared without regard to the emissions targets.

I also recommend passage of O'Connor Amendment #3, which earlier failed, but now in retrospect may appear a reasonable alternative leading to compromise. This amendment provides an additional 20 years to reach 100% emissions reduction.

I will not re-offer my amendments #2 and #4.

I can again support the other amendments offered by the Chairwoman and Commissioner Olson that earlier passed, except Olson #4.

In the spirit of compromise, I am willing to end my earlier support for Olson Amendment #4, which changes standards into goals. I believe my Amendment #3 and the existing waiver provision in the Energy Rules are adequate to address the uncertainties of achieving standards in the later years.

I invite my colleagues to react to these proposals.

Sincerely,

Jim O'Connor
Commissioner